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**This letter and the accompanying document are filed electronically through ePUC.**

March 3, 2021

Ms. Holly Anderson, Esq., Clerk  
Vermont Public Utility Commission  
112 State Street, 4th Floor  
Montpelier, VT 05620-2701

**Re: Case No. 20-0703-PET (Disconnection Moratorium)  
— Compliance filing by TDS Telecom**

Dear Holly:

Enclosed for filing, on behalf of Ludlow Telephone Company d/b/a TDS Telecom, Northfield Telephone Company d/b/a TDS Telecom, and Perkinsville Telephone Company, Inc. d/b/a TDS Telecom (collectively, “TDS Telecom”) are TDS Telecom’s responses to Order Reinstating the Temporary Moratorium on Disconnection (the “Reinstatement Order”), which the Commission issued on December 22, 2020, in the above-referenced proceeding.

Please let me know if you have any questions.

Sincerely,

*/s/ Paul J. Phillips*

Paul J. Phillips

Enclosure

cc: Scott Brooks, TDS Telecom  
ePUC Service List, Case No. 20-0703-PET

**This document has been filed electronically through ePUC.**

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency

Case No. 20-0703-PET

**COMPLIANCE REPORT OF TDS TELECOM**

**I. Introduction**

Ludlow Telephone Company d/b/a TDS Telecom, Northfield Telephone Company d/b/a TDS Telecom, and Perkinsville Telephone Company, Inc. d/b/a TDS Telecom (collectively, “TDS Telecom”) jointly submit this report in compliance with the Order Reinstating the Temporary Moratorium on Disconnection (the “Reinstatement Order”), which the Commission issued on December 22, 2020, in the above-captioned proceeding.

In its Reinstatement Order, the Commission stated as follows:

By no later than March 1, 2021, we direct utilities to file information on their customer arrearages and levels of payment agreements. Particularly, we direct utilities to file:

- a. The magnitude of customer balances that are more than 60 days past due, the number of customers with balances that are more than 60 days past due, and how these data compare with the same period in 2020 (broken out into residential and non-residential customers).
- b. The number of customers with whom the utility has interacted to set up a payment agreement between the date of the issuance of this Order and March 1, 2021.
- c. The number of payment agreements entered into between the date of the issuance of this Order and March 1, 2021.
- d. The number of payment agreements successfully adhered to by the customer between the date of the issuance of this Order and March 1m, 2021.
- e. Comments on whether the moratorium should be extended beyond March 31, 2021.

Reinstatement Order ¶ 4 at 25.

## **II. Compliance Information**

TDS Telecom reports as follows regarding its regulated telephone services in Vermont.

- a. Please see **Exhibit “A”** attached hereto.
- b. Since the date of the Reinstatement Order, TDS Telecom has interacted with 43 customers (36 Residential, 7 Business) to set up payments arrangements.
- c. TDS Telecom has established payment arrangements with 45 customers (38 Residential, 7 Business) have since the date of the Reinstatement Order.
- d. Thirty-five (35) customers (28 Residential, 7 Business) have successfully adhered to their payments arrangements with TDS Telecom since the date of the Reinstatement Order.
- e. The moratorium is not needed for regulated telephone services, as carriers work with their customers on a daily basis to try and remedy these situations.

DATED at Burlington, Vermont, this 3rd day of March, 2021.

Respectfully submitted,

Ludlow Telephone Company, Northfield Telephone  
Company, and Perkinsville Telephone Company, Inc.

By: PRIMMER PIPER EGGLESTON & CRAMER PC,  
Their Attorneys

By: /s/ Paul J. Phillips  
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## **CERTIFICATE OF SERVICE**

I, Paul J. Phillips, Esq., certify that on March 3, 2021, I caused electronic copies of the “Compliance Report of TDS Telecom” to be delivered to all participants in Case No. 20-0703-PET by means of the ePUC electronic filing system of the Vermont Public Utility Commission.

DATED: March 3, 2021

/s/ Paul J. Phillips  
Paul J. Phillips, Esq.

## TDS Telecom

Ludlow Telephone Company

Northfield Telephone Company

Pekinsville Telephone Company, Inc.

Years	B/R	BILL DATE	Count of 60+	Sum of OVER-60 AMT	Sum of OVER-90 AMT	Sum of 60+	
<b>2020</b>	<b>B</b>	Jan	73	3982.87	2611.04	6593.91	
		Feb	68	8958.55	2547.81	11506.36	
	<b>B Total</b>		<b>141</b>	<b>12941.42</b>	<b>5158.85</b>	<b>18100.27</b>	
	<b>R</b>	Jan	573	31683.15	14850.18	46533.33	
		Feb	530	28055.78	14859.99	42915.77	
	<b>R Total</b>		<b>1103</b>	<b>59738.93</b>	<b>29710.17</b>	<b>89449.1</b>	
<b>2020 Total</b>			<b>1244</b>	<b>72680.35</b>	<b>34869.02</b>	<b>107549.37</b>	
<b>2021</b>	<b>B</b>	Jan	56	6139.29	1150.62	7289.91	
		Feb	55	5887.1	1531.3	7418.4	
	<b>B Total</b>		<b>111</b>	<b>12026.39</b>	<b>2681.92</b>	<b>14708.31</b>	-3391.96
	<b>R</b>	Jan	532	28777.85	17266.43	46044.28	
		Feb	469	24145.87	15396.12	39541.99	
	<b>R Total</b>		<b>1001</b>	<b>52923.72</b>	<b>32662.55</b>	<b>85586.27</b>	-3862.83
<b>2021 Total</b>			<b>1112</b>	<b>64950.11</b>	<b>35344.47</b>	<b>100294.58</b>	
<b>Grand Total</b>			<b>2356</b>	<b>137630.46</b>	<b>70213.49</b>	<b>207843.95</b>	